

# EXHIBIT 12

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RENALDO NAVARRO, ) **CERTIFIED COPY**  
 )  
 )  
 Plaintiff, )  
 )  
 )  
 vs. ) Case No.  
 ) 3:19-cv-08157-VC  
 MENZIES AVIATION, INC., DOING )  
 BUSINESS AS MENZIES; and )  
 DOES 1 through 10, inclusive, )  
 )  
 Defendants. )  
 \_\_\_\_\_ )

Webex deposition of RENALDO NAVARRO, VOLUME I,  
taken remotely on behalf of the Defendant, beginning at  
9:41 a.m. and ending at 4:23 p.m., on Thursday,  
July 23, 2020, before JOANNA B. BROWN, Certified  
Shorthand Reporter No. 8570, RPR, CRR, RMR.

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12 ALSO PRESENT:

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1 Remotely; Thursday, July 23, 2020

2 9:41 a.m.

3

4 CAROLINE CARRERA,

5 having been duly sworn, translated English into

6 Tagalog and Tagalog into English as follows:

7

8 RENALDO NAVARRO,

9 having been duly sworn, was examined

10 and testified as follows:

11

12 THE REPORTER: Good morning. My name is  
13 Joanna Brown. I am a California certified stenographic  
14 reporter. Due to the current national emergency of the  
15 COVID-19 virus, this deposition is being handled via  
16 remote means.

17 Today's date is Thursday, July 23, 2020, and  
18 the time is approximately 9:41 a.m. This is the  
19 deposition of Renaldo Navarro in the matter of  
20 Renaldo Navarro v. Menzies Aviation, Inc. This is  
21 venued in the United States District Court, Northern  
22 District of California. The case number is  
23 3:19-cv-08157-VC.

24 At this time, I will ask counsel to identify  
25 yourselves, state who you represent, and agree on the

1 bit earlier, is that the only time you've been a party  
2 to a lawsuit?

3 A Yes, sir.

4 Q Have you ever made any type of legal claim  
5 against a former employer other than Menzies?

6 A There was, sir.

7 Q What was that?

8 A At Swissport. It's the name of the company,  
9 Swissport.

10 Q And specifically what type of legal claim did  
11 you make against Swissport, if it was not a lawsuit?

12 MR. URIARTE: I'm going to -- I'm just going  
13 to instruct the witness not to answer right now.

14 Chris, can we, like, just meet and confer for  
15 a second here?

16 He has a settlement agreement with Swissport,  
17 and it has a confidentiality clause. So we cannot --  
18 I guess what we could say is that they were  
19 employment-related claims with regards to his  
20 employment at Swissport.

21 MR. WARD: Okay. May I -- did he -- what I'd  
22 like to know is if Mr. Navarro made any type of  
23 administrative claim against Swissport or if it was  
24 purely a private settlement prior to any type of formal  
25 action.

1 MR. URIARTE: It was a private settlement.

2 Yeah.

3 MR. WARD: Okay. We are going to need to come  
4 back to that, but I'll move on at the moment.

5 Q Let me ask, what is the approximate date of  
6 that settlement agreement?

7 A What's that for? Swissport?

8 Q Yes. What is the date of that settlement  
9 agreement, approximately?

10 A I no longer -- I'm no longer sure about 2013  
11 or '14. I no longer remember, 2014, 2013, 2015, like  
12 that.

13 Q Is it your belief that -- well, strike that  
14 question. Were you --

15 Was your employment with Swissport terminated  
16 involuntarily?

17 MR. URIARTE: Yeah. I mean, Chris, I don't  
18 want to make this process difficult. I'm just not  
19 certain as we sit here whether he'd be violating his  
20 confidentiality agreement if he answered that, you  
21 know. I'm not certain with regards to that. Look, if  
22 I can send to you a copy of the settlement agreement, I  
23 would, but I'm just not -- I think we have a notice  
24 requirement with regard to that. We would have to  
25 notify Swissport before we divulge.

1 MR. WARD: All right.

2 Q Mr. Navarro, is it your belief that if you  
3 make legal claims against a former employer, that you  
4 are likely to get a settlement from them?

5 MR. URIARTE: Objection. Vague and ambiguous.  
6 Calls for a legal conclusion.

7 THE INTERPRETER: Sorry. Vague and ambiguous  
8 and what? What's the other one?

9 MR. URIARTE: Calls for a legal conclusion.

10 You can answer, Mr. Navarro, if you  
11 understand.

12 THE WITNESS: Yes. Please repeat.

13 BY MR. WARD:

14 Q My question is, is it your belief that if you  
15 make legal claims against a former employer, you are  
16 likely to get a settlement?

17 A Yes, sir.

18 Q Is that what you are doing in this lawsuit?

19 A Yes, sir.

20 Q Is it your belief that employers are likely to  
21 give you a settlement if you make claims against them  
22 regardless of the merit of those claims?

23 MR. URIARTE: Objection. Calls for a legal  
24 conclusion. Vague and ambiguous.

25 THE WITNESS: Please repeat the question

1 again.

2 MR. WARD: Sure.

3 Q Is it your belief that if you make legal  
4 claims against a former employer, you are likely to get  
5 a settlement from them regardless of the merit of those  
6 claims?

7 A Yes, sir.

8 MR. URIARTE: Mr. Navarro, are you  
9 understanding the Tagalog interpretation?

10 THE WITNESS: (Inaudible.)

11 MR. URIARTE: You have to answer in Tagalog.

12 MR. URIARTE: Yeah. I mean, I have --

13 THE INTERPRETER: Just a second. Let me  
14 interpret that.

15 THE WITNESS: It seems it's far from my  
16 understanding in Tagalog.

17 MR. URIARTE: I think -- Ms. Carrera, I  
18 understand your proficiency and your amazing use of the  
19 official, traditional, government-level Tagalog, but  
20 it's sure not what usual, normal people in Tagalog  
21 would use in the street. There are two forms of  
22 Tagalog. There's the Tagalog that is normally used  
23 around the country by normal people, but when you use  
24 words like (speaks Tagalog) -- I went to a university  
25 there, and I spoke formal Tagalog; but normal people

1 Q And did you graduate?

2 A Are you asking how long? How long, sir?

3 Q Yes.

4 A Yes, sir.

5 Q Did you attend any type of college or  
6 university in the Philippines?

7 A Yes, sir.

8 Q Where was that?

9 A Philippine College of Criminology, but I did  
10 not finish it.

11 Q Any other type of schooling in the Philippines  
12 other than high school and what you just mentioned  
13 prior to moving to the United States?

14 A No more, sir.

15 Q Can you please identify for me all of your  
16 employers prior to Menzies Aviation since you  
17 arrived -- well, let me start over.

18 After you moved to the United States, can you  
19 please list all of your employers up to Menzies.

20 A In 2005, when I got here, I worked at  
21 Service Fair part-time -- oh, Service Air part-time.  
22 2005, in September, I started at ASIG Aviation. In  
23 2005, where I worked for, it was purchased by  
24 Swissport. It was purchased in 2015 by Swissport, and  
25 in 2016, ASIG was purchased by Menzies.



1 Q Did I understand you correctly that you worked  
2 for ASIG -- you've had two different periods of time  
3 where you were employed by ASIG?

4 A What do you mean two different times?

5 Q So let me do it this way: First you -- first  
6 you started at Service Air; right?

7 A Yes, sir.

8 Q And did you remain employed by Service Air up  
9 to when Swissport purchased Service Air?

10 THE INTERPRETER: Please repeat the question.

11 MR. WARD: Sure.

12 From when he started at Service Air until the  
13 purchase by Service Air of Swissport, was he  
14 continuously employed by Service Air?

15 THE WITNESS: Yes, it was continuous.

16 BY MR. WARD:

17 Q Okay. And then, when you started your  
18 employment with ASIG in approximately 2016, was that  
19 the first time you had worked for ASIG?

20 A What I did was work in 2005 at ASIG up to 2016  
21 when Menzies purchased ASIG, and I continuously worked  
22 for them.

23 Q I see. You were working for both Service Air  
24 and ASIG at the same time?

25 A Yes, sir. I'm sorry. Different. They were



1 different.

2 Q Okay. Did you ever have any type of  
3 supervisory job at Service Air?

4 THE INTERPRETER: Please repeat the question.

5 MR. WARD: Sure.

6 Q At Service Air, did you have any type of  
7 supervisory responsibilities?

8 A No, sir.

9 Q The only supervisory job you've had was at  
10 ASIG and Menzies; right?

11 A Yes, sir.

12 Q Have you ever declared bankruptcy?

13 A No, sir.

14 Q Have you ever been convicted of a felony in  
15 the United States?

16 A No, sir.

17 Q And you understand that Menzies purchased ASIG  
18 at some point a couple of years ago; correct?

19 A 2016, sir.

20 Q While you were employed by ASIG, you were  
21 promoted to supervisor; right?

22 A Yes, sir.

23 Q And at that time, were you given additional  
24 job responsibilities as a supervisor?

25 A Yes, sir.

1           Q    What did you understand those additional  
2   responsibilities to include?

3           A    First of all, with people. Before you were  
4   with people and then you had to handle people, and  
5   then -- and also, with the flight, you should be able  
6   to distribute it to the people equally.

7           Q    And when you say "distribute," are you talking  
8   about distributing the amount of work across the people  
9   you supervise equally?

10          A    Yes, sir.

11          Q    The supervisory job that you received at ASIG,  
12   was it fuel?

13               THE INTERPRETER: I'm sorry. Was it what?  
14   Hello?

15               MR. URIARTE: There's an audio issue.

16               THE INTERPRETER: I didn't get the complete  
17   question.

18               MR. URIARTE: Chris, your screen -- Chris,  
19   your screen shows a muted icon again.

20               MR. WARD: I just lost sound in here again.  
21   Can you -- I cannot hear anything that anybody is  
22   saying, but I think you can all hear me. Can somebody  
23   nod their head yes.

24               MR. URIARTE: Yes.

25               THE INTERPRETER: Yes, yes.

1 MR. URIARTE: Can we get off the record?

2 MR. WARD: Off the record again, please.

3 (Off the record.)

4 MR. WARD: Are we back on the record?

5 THE INTERPRETER: Yes, I'm here.

6 MR. WARD: All right. Can you read off the  
7 last question that I asked as well as the response. I  
8 missed all of that.

9 (The record was read as follows: "The  
10 supervisory job that you received at ASIG,  
11 was it fuel?")

12 MR. WARD: All right. I couldn't hear that,  
13 and there's all kinds of background noise. Can you  
14 read the question and answer again, please.

15 (The record was read as follows: "The  
16 supervisory job that you received at ASIG,  
17 was it fuel?")

18 BY MR. WARD:

19 Q All right. So the question, Mr. Navarro, the  
20 supervisory job that you had at ASIG, was it fueling  
21 supervisor?

22 A Yes, sir. Yes, sir.

23 Q And is that the same job you held until your  
24 termination of employment?

25 A Yes, sir.

1 Q Do you consider the fueling-supervisor  
2 position to be part of company management?

3 A Yes, sir. Yes, sir.

4 Q Do you consider that fueling-supervisory  
5 position to be a leadership role?

6 A Yes, sir.

7 Q In your opinion, is it important for  
8 supervisors to be at work when they are expected to be  
9 there?

10 THE INTERPRETER: I didn't get the first part  
11 of the question. Please repeat that.

12 MR. WARD: Sure.

13 Q In your opinion, is it important for  
14 supervisors to be at work when they are expected to be  
15 there?

16 THE INTERPRETER: I'd ask that to be repeated.  
17 Sorry. There are some breaks in the words.

18 BY MR. WARD:

19 Q In your opinion, Mr. Navarro, is it important  
20 for supervisors to be at work when they are expected to  
21 be at work?

22 A Yes, sir.

23 Q In your opinion, is it important for  
24 supervisors to be honest in their communications with  
25 their employer?

1 A Yes, sir.

2 Q In your opinion, is it important for  
3 supervisors to follow company policy?

4 A Yes, sir.

5 Q In your opinion, is it important for  
6 supervisors to set a positive example for  
7 nonsupervisory employees?

8 MR. URIARTE: Objection. Vague and ambiguous.

9 You can answer, Mr. Navarro.

10 THE WITNESS: Yes, sir.

11 BY MR. WARD:

12 Q In your opinion, is it important for a  
13 supervisor to support the other members of company  
14 management?

15 A Yes, sir.

16 Q In your opinion, is it important for  
17 supervisors to work effectively with other company  
18 supervisors?

19 A Are you referring to another company, sir?

20 Q I'm just referring to, in a supervisory  
21 capacity, is it important -- is it important, in your  
22 opinion, to work effectively with other supervisors?

23 A Yes, sir.

24 Q In your opinion as a supervisor, is it  
25 important to avoid undermining the authority of other



1 supervisors?

2 THE INTERPRETER: This is the interpreter. I  
3 would like to consult a word first.

4 MR. WARD: Sure.

5 THE WITNESS: Please repeat that, sir.

6 MR. WARD: Sure.

7 Q As a supervisor, in your opinion, is it  
8 important not to undermine the authority of other  
9 supervisors?

10 A Yes, sir.

11 Q As a supervisor, is it appropriate, in your  
12 opinion, to involve nonsupervisory employees in  
13 personal disputes?

14 MR. URIARTE: Objection. Vague and ambiguous.  
15 Chris, did you say other supervisors or other  
16 nonsupervisors?

17 MR. WARD: I will have the reporter repeat my  
18 question, please.

19 (The record was read as follows: "As a  
20 supervisor, is it appropriate, in your  
21 opinion, to involve nonsupervisory  
22 employees in personal disputes?")

23 THE WITNESS: Yes, sir. That's correct.

24 BY MR. WARD:

25 Q And as a supervisor, should you avoid

1 involving nonsupervisory employees in personal  
2 grievances?

3 A Yes, sir.

4 Q As a supervisor, should you avoid pressuring  
5 employees to get involved in personal grievances?

6 A Will you please repeat the question again.

7 Q Sure. As a supervisor, is it important to  
8 avoid pressuring employees, nonsupervisory employees,  
9 to get involved in personal grievances?

10 MR. URIARTE: Before you answer that question,  
11 Mr. Navarro, remember the instruction earlier. If you  
12 do not understand the question that is said in Tagalog,  
13 indicate that if you are having a problem with the  
14 Tagalog interpretation. Do say that so that we know  
15 where the problem is. I just want to make sure that  
16 you do that. Okay? Great, Mr. Navarro.

17 THE INTERPRETER: This is the interpreter  
18 speaking. I would like to have the question, please,  
19 repeated.

20 MR. WARD: Sure.

21 Q My question is, in your opinion, should a  
22 supervisor avoid pressuring nonsupervisory employees to  
23 become involved in personal disputes?

24 A No, sir.

25 Q Why not?



1           A       For example, it's my own problem. Why should  
2 I involve them in my own problem?

3           Q       And if you had a conflict with another  
4 supervisor, in your opinion, should non- -- scratch  
5 that. Start over.

6                   As a supervisor, if you have a conflict with  
7 another supervisor, is it your understanding that  
8 nonsupervisory employees should not be brought into  
9 that problem?

10           THE INTERPRETER: Should that be -- I'm sorry.  
11 Chris, should not be what?

12           MR. WARD: I'll just ask a different question  
13 again.

14           THE INTERPRETER: Okay.

15 BY MR. WARD:

16           Q       As a supervisor, is it your understanding that  
17 you should not bring nonsupervisory employees into  
18 conflicts you have with another supervisor?

19           A       That's correct, sir.

20           Q       As a supervisor, if you ask a nonsupervisory  
21 employee to sign something, do you think you should  
22 first explain to the employee what you are asking them  
23 to sign?

24           THE INTERPRETER: Just a second. I have to  
25 translate this again.



1 THE WITNESS: That's correct, sir.

2 BY MR. WARD:

3 Q In your opinion, if a company has an opinion  
4 that a supervisor has been pressuring nonsupervisory  
5 employees --

6 THE INTERPRETER: This is the interpreter.  
7 It's breaking up.

8 MR. WARD: I'll try again.

9 THE INTERPRETER: Go ahead.

10 BY MR. WARD:

11 Q In your opinion, if a company has a good-faith  
12 belief that a supervisor has been intimidating  
13 nonsupervisory employees, would that be a valid basis  
14 for termination of the supervisor?

15 MR. URIARTE: Objection. Calls for a legal  
16 conclusion. Vague and ambiguous.

17 THE WITNESS: I think it depends, sir.

18 BY MR. WARD:

19 Q What would it depend upon?

20 A It depends on what the employee wants to tell  
21 them on what intimidation the employee is talking  
22 about.

23 Q In your opinion, is it important for employees  
24 to take responsibility for their errors?

25 THE INTERPRETER: Please repeat that.

1 MR. WARD: Sure.

2 Q In your opinion, is it important for employees  
3 to take responsibility for their errors?

4 A Yes, sir.

5 Q Okay. I'm going to do my best to see if we  
6 can make this work. I am sharing a document that I am  
7 going to mark as Exhibit 1 to your deposition.

8 Are you able to see that?

9 A Yes, sir.

10 Q Are you able to see the full exhibit -- the  
11 full page?

12 A No, sir. Just the date of incident, sir.

13 Q How about now?

14 A Yes, sir.

15 (Deposition Exhibit 1 was marked for  
16 identification, a copy of which is  
17 attached hereto.)

18 BY MR. WARD:

19 Q Have you ever seen Exhibit 1 before?

20 A No, sir.

21 Q To your knowledge, in March of 2007, were you  
22 ever spoken to by a supervisor about not following  
23 instructions?

24 A I don't remember anything (inaudible), what  
25 they were instructing me.

1 MR. WARD: We are off the record.

2 (Off the record.)

3 MR. WARD: Let's go back on the record.

4 Q Mr. Navarro, are you familiar with an  
5 individual by the name of Andrew Dodge?

6 A Yes, sir.

7 Q And at the time that you were employed by  
8 Menzies, was Mr. Dodge also a supervisor?

9 A Yes, sir.

10 Q And he was also a fueling supervisor; correct?

11 A Yes, sir.

12 Q So the same position you held; correct?

13 A Yes, sir.

14 Q Do you recall that there was some type of  
15 petition that was circulated, complaining about  
16 Andrew Dodge?

17 THE INTERPRETER: I'm sorry. Complaining  
18 about what?

19 BY MR. WARD:

20 Q Complaining about Andrew Dodge?

21 A Yes, sir.

22 Q And how did you first learn about that  
23 petition?

24 THE INTERPRETER: I'm sorry. Please repeat  
25 that.

1 BY MR. WARD:

2 Q Anybody else you can identify by name who  
3 asked you to sign the petition?

4 A I forgot the others, but it was Jezen and  
5 Rafael.

6 Q Did you sign the petition?

7 A Yes, sir.

8 Q Did you think it was appropriate to get  
9 involved in a petition against another supervisor?

10 MR. URIARTE: Objection. Vague and calls for  
11 a legal conclusion.

12 You can answer, Mr. Navarro. You can answer  
13 after my objection.

14 THE WITNESS: Please repeat the question.

15 BY MR. WARD:

16 Q The question was did you think it was  
17 appropriate to sign a petition against another  
18 supervisor?

19 MR. URIARTE: Same objection.

20 THE WITNESS: Maybe because, you know -- just  
21 on the right, you know.

22 BY MR. WARD:

23 Q I don't understand your answer, Mr. Navarro.

24 A If we know that what they are fighting for  
25 against Andrew Dodge is right, so why not help them and

1 also help the company also --

2 Q Do you think --

3 A -- to correct the wrong things that

4 Andrew Dodge did.

5 Q And do you think signing a petition about  
6 Andrew Dodge might undermine Andrew Dodge's authority  
7 with nonsupervisory employees?

8 A They are the ones who are signing that. They  
9 know the bad things that Andrew Dodge was doing to me;  
10 and, also, the things he was doing against the fueler,  
11 that was not good.

12 Q My question is different. My question is did  
13 you think signing a petition against Andrew Dodge might  
14 undermine Andrew Dodge's authority?

15 MR. URIARTE: Objection. Vague and ambiguous.

16 THE WITNESS: Maybe not, sir.

17 BY MR. WARD:

18 Q Maybe not or no?

19 A No, no (In English).

20 THE INTERPRETER: This is the interpreter. I  
21 interpreted "not" and "no" the same word.

22 THE WITNESS: No, sir.

23 BY MR. WARD:

24 Q Why not?

25 A If what's being said is the ones that is

1           A       Yes, sir.

2           Q       If Andrew Dodge had complained to  
3       nonsupervisory employees about you, do you think that  
4       would have been appropriate for him to do so?

5                   THE INTERPRETER: Please repeat that question.

6                   MR. WARD: Sure.

7           Q       If Andrew Dodge had complained to  
8       nonsupervisory employees about you, do you think  
9       Andrew Dodge would be acting appropriately?

10                  MR. URIARTE: Objection. Lacks foundation.  
11       Vague and incomplete hypothetical.

12                  THE WITNESS: It depends on him. I do not  
13       know what he is thinking of.

14       BY MR. WARD:

15           Q       Now, prior to signing this petition, you had  
16       previously submitted complaints about Mr. Dodge;  
17       correct?

18           A       Yes, sir.

19           Q       When was that?

20                  THE INTERPRETER: The interpreter would like  
21       to inquire.

22                  THE WITNESS: I no longer remember. The  
23       people told me what Andrew was doing. So I had that --  
24       I had that reported to the superiors.

25       ///

1 THE INTERPRETER: Yeah. I stand corrected. I  
2 omitted Renil.

3 MR. WARD: Let's strike that question. I'll  
4 ask it again.

5 Q So other than Randy Davies, Nico, Tracy,  
6 Renil, and John Qually, is there anybody else who you  
7 communicated complaints about Andrew Dodge to?

8 A No more.

9 Q How much time passed, approximately, between  
10 when you communicated these complaints and when you  
11 signed the petition?

12 A Maybe those are years. Years.

13 Q And in between when you communicated the  
14 complaints and when you signed the petition, did you  
15 make, yourself, any other complaints involving  
16 Andrew Dodge?

17 A No more -- no, sir.

18 MR. URIARTE: Is this a good time for lunch?  
19 We have lunch being delivered. So --

20 MR. WARD: We can go maybe for another 10 or  
21 15 minutes first, if that's all right.

22 MR. URIARTE: That's okay. Yeah. Maybe --  
23 yeah, closer to 10 hopefully.

24 MR. WARD: All right. I am going to mark  
25 as Exhibit 7 a document which has the Bates Nos. -152



1 to -154.

2 Q Mr. Navarro, this is a three-page document.

3 So let me know when you've reviewed the first page, and

4 then I'll move to the next one.

5 A Yes, sir.

6 Q Okay. Can I flip to the next page?

7 MR. URIARTE: I'm trying to magnify it because

8 it's really small. Is that okay, Mr. Navarro?

9 THE WITNESS: Okay.

10 BY MR. WARD:

11 Q All right. Have you had a chance to look at

12 this first page?

13 A Yes, sir.

14 Q Let me know when you've had a chance to look

15 at this second page.

16 A Yes, sir.

17 Q And how about this third page? Have you seen

18 this?

19 A Yes. The supervisor also.

20 Q All right. Do you recognize this document

21 I've marked as Exhibit 7?

22 A Yes, sir.

23 Q And is this the petition that was presented to

24 you for signature?

25 A Yes, sir.



1           Q     This first page that I have up right now, is  
2     that what the petition looked like when it was  
3     presented to you?

4           THE INTERPRETER:   Please repeat the question.  
5     The audio is breaking up.

6     BY MR. WARD:

7           Q     For this first page that I have up in front of  
8     you right now marked as -152, is that what the petition  
9     looked like when it was presented to you?

10          A     Yes, sir.

11          Q     And is that your signature on line 16 there on  
12     the second page of this exhibit?

13          A     Yes, sir.

14          Q     And you are the one who placed your signature  
15     there?

16          A     Yes, sir.

17               MR. WARD:   All right.   I'm going to mark this  
18     Exhibit 8.   It's Bates No. -150.

19          Q     Mr. Navarro, let me know when you've had a  
20     chance to review this.

21               THE REPORTER:   Mr. Ward, can we go off the  
22     record one moment?

23               MR. WARD:   Sure.

24               (Off the record.)

25               MR. WARD:   We are back on the record.

1           The reporter just clarified for me that  
2       documents Bates No. -152 to -154 I had marked as  
3       Exhibit 7, but it should actually be 8; is that right?

4           THE REPORTER:   Yes.

5           MR. WARD:   So then this document I have up  
6       right now, Bates No. -150, is actually going to be  
7       Exhibit 9.

8           (Deposition Exhibits 8 and 9 were marked  
9       for identification by the reporter,  
10       copies of which are attached hereto.)

11       BY MR. WARD:

12           Q       Have you had a chance to look at Exhibit 9  
13       here?

14           A       I already read it, sir.

15           Q       Prior to today, have you ever seen this  
16       Exhibit 9?

17           A       They gave me a copy.

18           Q       When you say "they," who is "they"?

19           A       The shop steward gave it to me, Rafael.

20           Q       Did Rafael give this to you after you had  
21       signed the petition?

22           A       I think this is the second petition, that this  
23       is the second petition they made against Andrew Dodge.

24           Q       So is it your testimony that there were two  
25       petitions against Andrew Dodge?